



JAGSONPAL PHARMACEUTICALS LIMITED

Corporate Office: Nimai Tower, 3rd Floor, Plot No. 412-415, Phase-IV, Udyog Vihar, Gurugram -122015,
Haryana (India)

Ph.: +91 124 4406710; E-mail: cs@jagsonpal.com; Website: www.jagsonpal.com
CIN NO. L74899DL1978PLC009181

May 27, 2025

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| The Department of Corporate Services- Listing BSE Ltd , Phiroze Jeejeebhoy Towers, Dalal Street Mumbai-400 001 Scrip Code: 507789 | The Department of Corporate Services- Listing National Stock Exchange of India Ltd Exchange Plaza, C-1, Block G, Bandra Kurla Complex, Bandra (E) Mumbai – 400 051 Symbol: JAGSNPHARM |
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Subject: Annual Secretarial Compliance Report for the financial year ended March 31, 2025 under Regulation 24A of the SEBI (Listing Obligations and Disclosure Requirements Regulations, 2015.

Dear Sir/ Madam,

Pursuant to Regulation 24A of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 read with SEBI Circular No. CIR/CFD/CMD1//27/2019 dated February 8, 2019, please find enclosed the Annual Secretarial Compliance Report for the Financial Year ended March 31, 2025.

We request you to take the above on record.

Thanking you,

For Jagsonpal Pharmaceuticals Limited

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PRATHAM RAWAL
RAWAL Date: 2025.05.27
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Pratham Rawal

Company Secretary & Compliance Officer

Encl.: A/a

ANNUAL SECRETARIAL COMPLIANCE REPORT

Secretarial Compliance Report of Jagsonpal Pharmaceuticals Limited
for the financial year ended 31/03/2025

[Under Regulation 24A of the Securities and Exchange Board of India
(Listing Obligations and Disclosure Requirements) Regulations, 2015]

We have conducted the review of the compliance of the applicable statutory provisions and the adherence to good corporate practices by Jagsonpal Pharmaceuticals Limited (hereinafter referred as the 'listed entity'), having its Registered Office at T-210 J, Shahpur Jat, New Delhi - 110049. Secretarial Review was conducted in a manner that provided us with a reasonable basis for evaluating the corporate conducts/ statutory compliances and expressing my opinion thereon.

We have examined:

- (a) All the documents and records made available to us and explanation provided by Jagsonpal Pharmaceuticals Limited ("The listed entity"),
- (b) The filings/ submissions made by the listed entity to the Stock Exchanges,
- (c) Website of the listed entity,
- (d) Any other document/ filing, as may be relevant, which has been relied upon to make this Report.

For the financial year ended 31/03/2025 ("Review Period") in respect of compliance with the provisions of:

- (a) the Securities and Exchange Board of India Act, 1992 ("SEBI Act") and the regulations, circulars, guidelines issued thereunder; and
- (b) The Securities Contracts (Regulation) Act, 1956 ("SCRA"), rules made thereunder and the regulations, circulars, guidelines issued thereunder by the SEBI;

The specific Regulations, whose provisions and the circulars/ guidelines issued thereunder, have been examined, include: -

- a) Securities and Exchange Board of India (LODR) Regulations, 2015;
- b) Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018; **(Not applicable to the Company during the Review Period)**
- c) Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011;
- d) Securities and Exchange Board of India (Buyback of Securities) Regulations, 2018; **(Not applicable to the Company during the Review Period)**
- e) Securities and Exchange Board of India (Share Based Employee Benefits and Sweat Equity) Regulations, 2021;



AYUSH KHANDELWAL & ASSOCIATES

Company Secretaries

- f) Securities and Exchange Board of India (Issue and Listing of Non-Convertible Securities) Regulations, 2021 **(Not applicable to the Company during the Review Period)**
- g) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;
- h) Other regulations as applicable
- and circulars/ guidelines issued thereunder.

And based on the above examination, I/We hereby report that, during the Review Period:

- (a) The listed entity has complied with the provisions of the above Regulations and circulars/ guidelines issued thereunder, except in respect of matters specified below:

| Sr. No. | Compliance Requirement <i>(Regulations / circulars/ guidelines including specific clause)</i> | Regulation/ Circular No. | Deviations | Action Taken by | Type of Action | Details of Violation | Fine Amount | Observations/Remarks of the Practicing Company Secretary (PCS) | Management Response | Remarks |
|---------|--|--------------------------|------------|-----------------|----------------|----------------------|-------------|--|---------------------|---------|
| NIL | | | | | | | | | | |

- (b) The listed entity has taken the following actions to comply with the observations made in previous reports:

| Sr. No. | Observations/Remarks of the Practicing Company Secretary (PCS) in the previous reports) | Observations made in the Secretarial Compliance report for the year ended..... <i>(The years are to be mentioned)</i> | Compliance Requirement (Regulations/ circulars/ guidelines including specific clause) | Details of violation / Deviations and actions taken if any, on the listed entity | Remedial actions, if any, taken by the listed entity | Comments of the PCS on the actions taken by the listed entity |
|---------|---|--|---|--|--|---|
| NIL | | | | | | |

I. I/we hereby report that, during the review period the compliance status of the listed entity with the following requirements:

| Sr. No | Particulars | Compliance Status (Yes/No/NA) | Observation s/ Remarks by PCS* |
|--------|--|----------------------------------|---|
| 1. | <p>Secretarial Standards:</p> <p>The compliances of the listed entity are in accordance with the applicable Secretarial Standards (SS) issued by the Institute of Company Secretaries of India (ICSI).</p> | Yes | Nil |
| 2. | <p>Adoption and timely updation of the Policies:</p> <ul style="list-style-type: none"> • All applicable policies under SEBI Regulations are adopted with the approval of board of directors of the listed entities. • All the policies are in conformity with SEBI Regulations and have been reviewed & updated on time, as per the regulations/ circulars/guidelines issued by SEBI. | <p>Yes</p> <p>Yes</p> | <p>Nil</p> <p>Nil</p> |
| 3. | <p>Maintenance and disclosures on Website:</p> <ul style="list-style-type: none"> • The listed entity is maintaining a functional website. • Timely dissemination of the documents/ information under a separate section on the website. • Web-links provided in annual corporate governance reports under Regulation 27(2) are accurate and specific which redirects to the relevant document(s)/section of the website. | <p>Yes</p> <p>Yes</p> <p>Yes</p> | <p>Nil</p> <p>Nil</p> <p>Nil</p> |
| 4. | <p>Disqualification of Director(s):</p> <p>None of the director(s) of the listed entity is/ are disqualified under Section 164 of Companies Act, 2013 as confirmed by the listed entity.</p> | Yes | Nil |
| 5. | <p>Details related to subsidiaries of listed entities have been examined w.r.t.:</p> <p>(a) Identification of material subsidiary companies.</p> <p>(b) Disclosure requirement of material as well as other subsidiaries.</p> | <p>NA</p> <p>NA</p> | <p>The listed entity did not have any subsidiaries during the reporting period.</p> |

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| 6. | <p>Preservation of Documents:</p> <p>The listed entity is preserving and maintaining records as prescribed under SEBI Regulations and disposal of records as per policy of preservation of documents and archival policy prescribed under SEBI LODR Regulations, 2015.</p> | Yes | Nil |
| 7. | <p>Performance Evaluation:</p> <p>The listed entity has conducted performance evaluation of the board, independent directors and the committees at the start of every financial year/during the financial year as prescribed in SEBI Regulations.</p> | Yes | Nil |
| 8. | <p>Related Party Transactions:</p> <p>(a)The listed entity has obtained prior approval of audit committee for all related party transactions; (b) In case no prior approval obtained, the listed entity shall provide detailed reasons along with confirmation whether the transactions were subsequently approved/ratified/rejected by the audit committee.</p> | Yes | <p>Nil</p> <p>All Related party transactions were entered after obtaining prior approval of the Audit Committee.</p> |
| 9. | <p>Disclosure of events or information:</p> <p>The listed entity has provided all the required disclosure(s) under Regulation 30 along with Schedule III of SEBI LODR Regulations, 2015 within the time limits prescribed thereunder.</p> | Yes | Nil |
| 10. | <p>Prohibition of Insider Trading:</p> <p>The listed entity is in compliance with Regulation 3(5) & 3(6) SEBI (Prohibition of Insider Trading) Regulations, 2015.</p> | Yes | Nil |
| 11. | <p><u>Actions taken by SEBI or Stock Exchange(s), if any:</u></p> <p>Actions taken against the listed entity/its promoters/directors/subsidiaries by SEBI or Stock Exchanges (including under the Standard Operating Procedures issued by SEBI through various circulars) under SEBI Regulations and circulars/guidelines issued thereunder:</p> <p>SEBI Settlement Order:</p> <p>Mr. Rajpal Singh Kochhar, promoter of the Company, has received Settlement Order No. SO/PSD/2024-25/7813 from the Securities and Exchange Board of India (SEBI) in respect of a</p> | Yes | <p>Nil</p> <p>The SEBI had imposed a penalty of Rs. 22,75,000/- (Rupees Twenty-Two Lakh Seventy-Five Thousand Only) towards settlement amount. The same has duly paid by Mr. Rajpal Singh Kochhar.</p> |

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| | <p>settlement application filed for inadvertent non-compliance with the provisions of the SEBI (Prohibition of Insider Trading) Regulations, 2015, during the period December 2021 to March 2022. The matter has been settled as per the terms of the said order issued by SEBI.</p> <p>The settlement order was passed by SEBI on an application made by Mr. Rajpal Singh Kochhar for non-compliance with provisions of SEBI PIT Regulations for non-closure of trading window and not maintaining Structural Digital Database during the period December 2021 to March 2022.</p> <p>The settlement proceedings and consequent settlement order was not for any dealing or trading in the Securities of the Company</p> | | |
| 12. | <p>Resignation of statutory auditors from the listed entity or its material subsidiaries:</p> <p>In case of resignation of statutory auditor from the listed entity or any of its material subsidiaries during the financial year, the listed entity and / or its material subsidiary(ies) has / have complied with paragraph 6.1 and 6.2 of section V-D of chapter V of the Master Circular on compliance with the provisions of the LODR Regulations by listed entities.</p> | N.A. | There was no event of resignation of the Statutory Auditors during the Review Period in the listed entity or any of its material subsidiaries. |
| 13. | <p>Additional Non-compliances, if any:</p> <p>No additional non-compliances observed for any SEBI regulation/circular/guidance note etc. except as reported above.</p> | Yes | Nil |

*Observations/ Remarks by PCS are mandatory, if the Compliance status is provided as 'No' or 'N.A. '.

In terms of Circular SEBI/HO/CFD/CFD-PoD-2/CIR/P/2024/185 dated December 31, 2024, we further confirm that the requirements for disclosure of Employee Benefit Scheme Documents in terms of regulation 46(2)(za) of the LODR have duly been complied with.

Assumptions & limitation of scope and review:

1. Compliance of the applicable laws and ensuring the authenticity of documents and information furnished, are the responsibilities of the management of the listed entity.
2. Our responsibility is to report based upon our examination of relevant documents and information. This is neither an audit nor an expression of opinion.
3. We have not verified the correctness and appropriateness of financial records and books of account of the listed entity.

4. This report is solely for the intended purpose of Compliance in terms of Regulation 24A (2) of the SEBI (LODR) Regulations, 2015 and is neither an assurance as to the future viability of the listed entity nor of the efficacy or effectiveness with which the management has conducted the affairs of the listed entity.

Date: 26.05.2025
Place: Jaipur
UDIN: A041316G000444961

FOR AYUSH KHANDELWAL & ASSOCIATES
COMPANY SECRETARIES

AYUSH
KHANDELWAL

Digitally signed by
AYUSH KHANDELWAL
Date: 2025.05.26
18:18:40 +05'30'

(AYUSH KHANDELWAL)

PROPRIETOR

M. No. A41316

CP No. 19171

Peer Review No. 4647/2024